

IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF CALIFORNIA

IN RE: UBER TECHNOLOGIES, INC.,
PASSENGER SEXUAL ASSAULT
LITIGATION

Case No. 23-md-03084-CRB

This Document Relates to:

ALL CASES

**DECLARATION OF ANDREW R.
KAUFMAN IN SUPPORT OF
ADMINISTRATIVE MOTION TO
CONSIDER WHETHER ANOTHER
PARTY'S MATERIAL SHOULD BE
FILED UNDER SEAL**

I, Andrew R. Kaufman, declare:

1. I am an attorney in the law firm of Girard Sharp, LLP. I am a member of the State Bars of Wisconsin and New York, and am admitted to practice pro hac vice before this Court. I make this declaration based on my own personal knowledge. If called upon to testify, I could and would testify competently to the truth of the matters stated herein.

2. As set forth in the accompanying motion, the below materials, or portions thereof, were designated by Uber as "CONFIDENTIAL" or "HIGHLY CONFIDENTIAL – ATTORNEYS' EYES ONLY" pursuant to the protective order entered in this case. As the designating party, Uber bears the burden of establishing that its designations warrant sealing.

3. Plaintiffs take no position with respect to Uber's designations at this time but reserve all rights to challenge designations in the future, including on any motions for summary judgment and at trial.

Document	Description	Designating Party
Portions of Joint Letter Brief	Portions referring to and describing Exhibit 1 or 2	Uber

Document	Description	Designating Party
Portions of O'Connor Declaration	Parts of the O'Connor Declaration Uber requested be redacted	Uber
Exhibit 1	Uber-produced document bates stamped UBER-MDL3084-DFS00002727	Uber (and Plaintiffs) ¹
Exhibit 2	Uber-produced document bates stamped UBER-MDL3084-00084720	Uber

I declare under penalty of perjury that the foregoing is true and correct.

Executed on April 17, 2025 in Milwaukee, Wisconsin.

/s/ Andrew R. Kaufman
Andrew R. Kaufman

¹ Because Exhibit 1 contains plaintiff-specific personal information, as well as highly sensitive and private disclosures regarding incidents of sexual assaults, plaintiffs' move separately pursuant to Local Rule 79-5 to seal that exhibit.